UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

| UNITED | STATES. | et al |
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| | | |

Plaintiffs,

No. 1:23-cv-00108-LMB-JFA

v.

GOOGLE LLC,

Defendant.

[PROPOSED] ORDER

Upon consideration of Non-Party The New York Times Company's ("The Times")

Objections to the Public Use of Confidential Documents and Testimony ("Objections"), the

Declarations of Jennifer Donohue and Joy Robins, The Times's Motion to Seal, and the sealed

materials provided to this Court, and pursuant to Local Civil Rule 5 and the standards set forth in *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000), the Court hereby

FINDS that the information redacted in Exhibits C and D to The Times's Objections should be sealed because disclosure would cause The Times significant competitive and commercial harm for the reasons stated in The Times's Objections and in the Donohue and Robins Declarations. Accordingly, for good cause shown, it is hereby

ORDERED that The Times's Motion to Seal is GRANTED; and it is further

ORDERED that the information contained beneath the redactions reflected in **Exhibits C**and **D** to The Times' Objections shall be maintained under seal by the Clerk, until otherwise directed.

DATE: